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Attorney for the Debtors
Jerry & Sue Bewley

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA**

In Re: Chapter 7
DCN: SCR-01

BEWLEY, JERRY &
BEWLWY, SUE,

Case No: 11-43057

Debtors.

**DEBTOR'S MOTION TO COMPEL TRUSTEE
TO ABANDON ASSET OF ESTATE**

Date: December 5, 2011
Time: 10:00AM
Location: Sacramento Division
501 "I" Street, 7th Floor, Courtroom 28
Sacramento, CA 95814
Hon.: Michael S. McManus

Debtors hereby move the Court-Appointed Trustee to abandon asset of the estate. Debtors request abandonment based on the following:

1. Debtor Sue Bewley operates a hydroponic store. The inventory consists of a wide range of supplies, with lighting equipment to soil and nutrient supplements.
2. The store does not experience "high volume" for sales. Therefore, products with shelf life expiration dates have all now expired. This diminishes inventory value.

- 1 3. Debtor estimates over-all value of the inventory to be approximately 25% of the initial
2 investment into stocking the store when it first opened. Value of inventory has been
3 properly exempted, with an approximate amount of \$3,843.97 that was not able to be
4 exempted within the amounts permitted.
- 5 4. Debtors are willing to negotiate with the Court appointed Trustee in regard to this un-
6 exempted amount for purpose of settlement.
- 7 5. Although this store is not at this time profitable, Debtor wishes to continue keeping the
8 store open in an attempt to increase sales.
- 9 6. Debtors pray the Court to compel Trustee to abandon this business operation to allow
10 for un-interrupted continuance of the store staying open.
11

12 Debtors declare under penalty of perjury that the above-stated facts are true and correct.
13
14

15 Dated: November 1, 2011

/s/Jerry Bewley
Debtor

/s/ Sue Bewley
Debtor